

8 Kramer

To Whom it May Concern:

My name is Jonathan Kramer and I am an attorney practicing in Des Moines, Iowa. Although I work with a firm, my thoughts here do not reflect the thoughts of others in my firm or the firm generally on this issue.

I have read the request for comment concerning applying anti-money laundering programs to real estate closings. I believe a good middle-ground requirement would be to require reporting of cash transactions on Forms 8300 if the amounts are over 10,000 in cash, however no reporting should be required if the funds presented are via check, certified funds or other funds already in the possession of a financial institution required to report suspicious activity. This requirement would add a minor inconvenience to those involved in transactions and only in a small minority of total closings.

Sincerely,

Jonathan Kramer